

**P O R T E R | S C O T T**

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Attorney for Plaintiff  
MAHMOUD SAQQA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MAHMOUD SAQQA,

Plaintiff,

v.

SAN JOAQUIN COUNTY; KRIS BALAJI  
and DOES 1 - 50,

Defendants.

CASE NO. 2:20-cv-00331-WBS-AC

**JOINT STIPULATION TO MODIFY  
PRE-TRIAL SCHEDULING ORDER  
AND ORDER**

Complaint Filed: 02/13/2020  
Trial: 11/16/21

This Stipulation is entered into by and between Plaintiff MAHMOUD SAQQA (“Plaintiff”) and Defendants SAN JOAQUIN COUNTY and KRIS BALAJI (“Defendants”) (collectively, “the Parties”) by and through their respective counsel. The Parties enter into this stipulation and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of the Court’s Scheduling Order (ECF No. 7). The parties request to continue non-expert discovery and dispositive

1 motion deadlines related to this action by three weeks.

2 WHEREAS, trial is currently scheduled for November 16, 2021;

3 WHEREAS, the parties have been diligently pursuing discovery. The parties have largely  
4 completed written discovery and conducted several depositions;

5 WHEREAS, Plaintiff's deposition was scheduled to occur on April 28 and 29, 2021. However,  
6 the deposition must be postponed by three weeks due to Plaintiff's observance of Ramadan, which  
7 begins on April 12, 2021, and ends in the evening of May 12, 2021. Therefore, the Parties respectfully  
8 request a three-week continuance of non-expert discovery and dispositive motion deadlines.

9 WHEREAS, there have been no previous modifications of the scheduling order in this matter.

10 WHEREAS, the parties have met and conferred and stipulate to continue discovery and  
11 dispositive motion deadlines by three weeks, as follows:

12 Last day to complete non-expert discovery: June 25, 2021

13 Last day to file dispositive motions: August 6, 2021

14 For the reasons stated above, the parties submit that good cause exists for a further continuance  
15 of non-expert discovery and dispositive motion deadlines in this action by three weeks.

16  
17 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

18  
19 DATED: April 7, 2021

/s/George F. Allen

George F. Allen

Attorney for Plaintiff MAHMOUD SAQQA

20  
21  
22 DATED: April 7, 2021

/s/ David R. Norton

David R. Norton

Attorney for Defendants SAN JOAQUIN  
COUNTY and KRIS BALAJI

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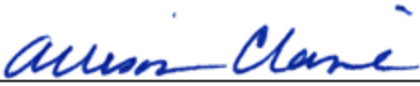
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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: April 7, 2021

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE